

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

UNITED STATES OF AMERICA

v.

DONALD L. BLANKENSHIP

Criminal No. 5:14-cr-00244

**SUPPLEMENTAL FILING IN SUPPORT OF
MR. BLANKENSHIP'S MOTION FOR *DE NOVO* REVIEW
BEFORE THE DISTRICT OF HIS CONDITIONS OF PRETRIAL RELEASE**

On January 22, 2015, Mr. Blankenship filed a motion for *de novo* review of his conditions of pretrial release. *See* Dkt. Nos. 68, 119. The motion asks the District Court to strike or substantially modify certain conditions of release that impose onerous restrictions on Mr. Blankenship's liberties – restrictions which lack basis in law or fact and which are not the “least restrictive” conditions necessary to reasonably assure his appearance or the safety of any other person in the community. The conditions prevent Mr. Blankenship from residing in his home state and from having any contact at all, on any subject, with thousands upon thousands of individuals, including former colleagues and close friends. Each day that passes with these conditions intact works an unconstitutional, unnecessary and intolerable hardship on Mr. Blankenship. The conditions bear no relationship to risk of flight or community safety, and their continued enforcement is purely punitive.

While awaiting the District Court's ruling on this motion, Mr. Blankenship sought permission from his probation officer to make a trip to his home in Nevada to attend to personal matters. Today, the probation officer informed Mr. Blankenship that it is necessary for him to make this request to the court.

WHEREFORE, Mr. Blankenship respectfully requests that the District Court enter an order granting his pending motion to strike or substantially modify: (1) the residency requirement in paragraph 7(s) of the Order Setting Conditions of Release; (2) all travel restrictions in paragraph 7(f) of the Order, other than the prohibition on travel outside the continental United States; and (3) the no-contact condition in paragraph 7(g) of the Order.

Dated: March 12, 2015

Respectfully submitted,

/s/ William W. Taylor, III

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been electronically filed and service has been made
by virtue of such electronic filing this 12th day of March 2015 on:

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/s/ Eric R. Delinsky
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